

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**  
 In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

March 2, 2023

The Honorable George B. Daniels  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Daniels:

The Plaintiffs' Executive Committees, with the consent of counsel for the Kingdom of Saudi Arabia and Dallah Avco, respectfully request an extension from Tuesday, March 7, 2023, until Friday, March 10, 2023, for the deadline for the plaintiffs to reply to "Saudi Arabia's Consolidated Opposition To CAC Plaintiffs' Motion For Certification And For Stay And To *Ashton* Plaintiffs' Motion For Reconsideration" (ECF No. 8884). We are requesting the additional time because members of the PECs and attorneys on the team preparing the response have a multi-day intra-firm commitment that will prevent the PECs from fully attending to the response from Saturday until Tuesday, and coordination among the PECs will still be necessary before finalizing the response. Counsel for the *Ashton* plaintiffs have also agreed to this schedule and asked that it also apply to *Ashton*'s reply as well.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
 ROBERT T. HAEFELE  
 MOTLEY RICE LLC  
 28 Bridgeside Boulevard  
 Mount Pleasant, SC 29465  
 Tel.: (843) 216-9184  
 Email: rhaefele@motleyrice.com

*For the Plaintiffs' Executive Committee for Personal Injury and Death Claims*

COZEN O'CONNOR

By: /s/ Sean P. Carter  
 SEAN P. CARTER  
 COZEN O'CONNOR  
 One Liberty Place  
 1650 Market Street, Suite 2800  
 Philadelphia, Pennsylvania 19103  
 Tel.: (215) 665-2105  
 Email: scarter@cozen.com

*For the Plaintiffs' Executive Committee for Commercial Claims*

cc: The Honorable Sarah Netburn, via ECF  
 All Counsel of Record via ECF